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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC, 　　　　　Plaintiff, 　　vs. UBER TECHNOLOGIES, INC.; OTTOMOTTO LLC; OTTO TRUCKING LLC, 　　　　　Defendants.	CASE NO. 3:17-cv-00939-WHA **DECLARATION OF FELIPE CORREDOR IN SUPPORT OF DEFENDANTS UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL EXHIBITS TO THEIR OPPOSITION TO PLAINTIFF WAYMO LLC'S MOTION FOR RELIEF FROM NONDISPOSITIVE PRETRIAL ORDER OF MAGISTRATE JUDGE (DKT. 1276)**

I, Felipe Corredor, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Defendants' Uber Technologies, Inc. and Ottomotto LLC's Administrative Motion to File Under Seal Exhibits to Their Opposition to Plaintiff Waymo LLC's Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge (Dkt. 1276) (the "Administrative Motion"). The Administrative Motion seeks an order sealing highlighted portions of Uber's Opposition to Plaintiff Waymo LLC's Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge (Dkt. 1276) ("Uber's Opposition") and the entirety of Exhibit 1 to the Liu Declaration.

3. The portions of Uber's Opposition and Exhibit 1 highlighted in green contain or refer to confidential business information, which Waymo seeks to seal.

4. Uber's Opposition (portions highlighted in green) and Exhibit 1 (portions highlighted in green in version filed herewith) contain, reference, and/or describe Waymo's highly confidential and sensitive business information. The information Waymo seeks to seal regards confidential details regarding Waymo and parent corporate entities Google and Alphabet's merger and acquisition practices and transactions, including financial details. I understand that this confidential business information is maintained by Waymo as secret. The public disclosure of this information would give Waymo's competitors access to in-depth insight into—and analysis of—Waymo, Google, and Alphabet's merger and acquisition strategy. If such information were made public, I understand that Waymo, Google, and Alphabet's competitive standing would be significantly harmed. Exhibit 1 additionally contains an address of a Google employee involved in this case, the disclosure of which would cause Waymo, Google, Alphabet, and that employee substantial harm due to the high public profile of this litigation.

5. Waymo's request to seal is narrowly tailored to those portions of Uber's Opposition and Exhibit 1 that merit sealing.

1   I declare under penalty of perjury under the laws of the State of California and the United

2 States of America that the foregoing is true and correct, and that this declaration was executed in San

3 Francisco, California, on August 28, 2017.

4   By */s/ Felipe Corredor*
                                                              _____
5   Felipe Corredor
                                                              Attorneys for WAYMO LLC
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8   **ATTESTATION**

9   In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this

10 document has been obtained from Felipe Corredor.

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12   By: */s/ Charles K. Verhoeven*
                                                              Charles K. Verhoeven
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